

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

In Re: § CHAPTER 11  
TRIAD MOTORS, LTD. §  
dba HOVEY MOTOR CARS, §  
DEBTOR § CASE NO. 24-50876-mmp

**NOTICE OF APPEARANCE AND REQUEST FOR  
SERVICE OF NOTICES AND PLEADINGS**

TO THE HONORABLE U.S. BANKRUPTCY JUDGE, MICHAEL M. PARKER:

Please take notice that the undersigned enters her appearance in the above referenced bankruptcy case on behalf of Security Service Federal Credit Union, a creditor.

Pursuant to Rule 2002 of the Bankruptcy Rules, the undersigned requests that all notices given or requested to be given and all papers served or required to be served in this case be given to and served as follows:

Elizabeth G. Smith  
Law Offices of Elizabeth G. Smith  
6655 First Park Ten, Suite 240  
San Antonio, Texas 78213  
Ph: 210-731-9177 Fax: 210-731-9130 Email: [beth@egsmithlaw.com](mailto:beth@egsmithlaw.com)

AND

Michael Cubeta, Sr. Vice-President/Deputy General Counsel  
Security Service Federal Credit Union  
15000 IH 10 West  
San Antonio, TX 78249

AND

Zachary Wilson, Paralegal  
Security Service Federal Credit Union  
15000 IH 10 West  
San Antonio, TX 78249

Dated: May 28, 2024.

Respectfully submitted,

Law Offices of Elizabeth G. Smith  
6655 First Park Ten, Suite 240  
San Antonio, Texas 78213  
Phone: 210-731-9177 Fax: 210-731-9130

E-mail: [beth@egsmithlaw.com](mailto:beth@egsmithlaw.com)  
By: /s/ Elizabeth G. Smith  
Elizabeth G. Smith  
State Bar No. 18577200  
Attorney for Security Service Federal Credit Union

## CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2024, a true and correct copy of the foregoing Notice of Appearance and Request for Service of Notices and Pleadings was served to the Debtor, Debtor's counsel, the U.S. Trustee, the parties who have filed their appearance in this case shown below, and all parties listed in the Service List attached hereto either through the Court's ECF system or via U.S. First Class Mail, postage prepaid:

**by E-Notice of their appearance in this case as follows:**

Debtor's Attorney, James S. Wilkins, Wilkins & Wilkins, L.L.P., 1100 NW Loop 410, Suite 700  
San Antonio, TX 78213, [jwilkins@stic.net](mailto:jwilkins@stic.net)

U.S. Trustee, Jeremy Shane Flannery, 615 E. Houston, Suite 533, San Antonio, TX 78205;

NextGear Capital, Inc., c/o Greenberg Traurig, LLP, Attn: John D. Elrod, 333 Piedmont Rd NE,  
Suite 2500, Atlanta, GA 30305-1780;

Miguel Espinoza c/o Gerrit Schulze, 13750 San Pedro, Suite 810, San Antonio, TX 78232;

United Texas Credit Union c/o D. Wade Hayden, Hayden & Cunningham, PLLC, 7750 Broadway,  
San Antonio, TX 78209

**by First Class Mail as follows:**

**Debtor:** Triad Motors, Ltd., 30775 IH 10 West, Boerne, TX 78006;  
and, to those parties per the attached Service List.

By: /s/ Elizabeth G. Smith  
Elizabeth G. Smith  
Attorney for Security Service Federal Credit Union

Label Matrix for local noticing

0542-5

Case 24-50876-mmp

Western District of Texas

San Antonio

Tue May 28 15:02:06 CDT 2024

ADMIRAL PROPERTIES OF TEXAS

30775 IH 10 WEST

Boerne, TX 78006-9211

Triad Motors Ltd.

30775 IH-10 West

Boerne, TX 78006-9211

U.S. BANKRUPTCY COURT

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SAN ANTONIO, TX 78205-2055

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NEXTGEAR CAPITAL, INC.

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FT. WORTH, TX 76155-2243

United States Trustee - SA12

US Trustee's Office

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San Antonio, TX 78205-2055

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End of Label Matrix  
Mailable recipients 32  
Bypassed recipients 0  
Total 32